

EXHIBIT 12

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

**In re: Methyl Tertiary Butyl Ether
("MTBE") Products Liability Litigation**

-----X Master File No. 1:00-1898
MDL No. 1358 (SAS)
M21-88

-----X
This Document Relates To:

All Cases in MDL 1358

-----X **PLAINTIFFS' NOTICE OF
DEPOSITION OF DEFENDANT
MOBIL CORPORATION
RE: TASTE AND ODOR, WITH
PRODUCTION OF
DOCUMENTS AND VIDEOTAPING**

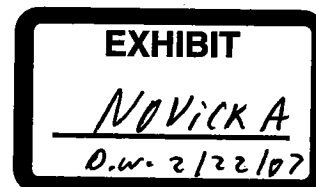
TO ALL PARTIES AND THEIR ATTORNEY(S) OF RECORD:

PLEASE TAKE NOTICE that, under Federal Rule of Civil Procedure 30(b)(6), Plaintiffs¹ will take the oral deposition of Defendant Mobil Corporation ("Defendant"), on November 30, 2006 at 10 a.m. at the law offices of Weitz & Luxenberg, P.C., 180 Maiden Lane, 17th Floor, New York, New York 10038-4925.

Pursuant to Federal Rule of Civil Procedure 30(b)(6), the deponent shall designate and produce at the deposition those of its officers, directors, managing agents, employees, or agents who are most qualified to testify on its behalf as to those matters set forth in the notice under the heading "designated issues" to the extent of any information known or reasonably available to the deponent.

In addition, the deponent must produce documents described in the section of this notice entitled "request for production of documents." Pursuant to Honorable Shira A. Scheindlin's Suggested Rules of Discovery Practice No. 7 governing Document Production at Depositions,

¹ This Notice of Deposition is served on behalf of all Plaintiffs in the MDL, except for the State of New Hampshire and the People of the State of California, hereinafter "Plaintiffs."



Plaintiffs request that Defendant produce the requested documents no later than ten (10) days prior to the deposition.

Plaintiffs request that ten (10) days prior to the deposition, Defendant provide: (1) the names and titles of the persons it will designate to give testimony; and (2) summaries of the areas in which each designated person will give testimony.

It is intended that this deposition will be videotaped and may be used at trial. It is further intended that instant visual display and streaming internet technology will be utilized to stenographically record and convey the testimony. The stenographic recording will be taken before Esquire Deposition Services, 1880 John F. Kennedy Boulevard, 15th Floor, Philadelphia, PA 19103.

DEFINITIONS

1. "DOCUMENT" or "DOCUMENTS" are defined to include any and all manner of electronic, written, typed, printed, reproduced, filmed or recorded material, and all photographs, pictures, plans, drawings, or other representations of any kind of anything pertaining, describing, or concerning, directly or indirectly, in whole or in part, the subject matter of each designated issue and request, and document(s) included, without limitation,
 - a. papers, books, journals, handbooks, manuals, ledgers, statements, memoranda, reports, invoices, worksheets, work papers, notes, transcription of notes, letters, correspondence, abstracts, diagrams, plans, blueprints, specifications, pictures, drawings, films, photographs, graphic representations, diaries, calendars, desk calendars, lists, logs, publications, advertisements, instructions, minutes, orders, messages, résumés, summaries, agreements, contracts, telegrams, telexes, cables, recordings, electronic mail, audio tapes, transcriptions of tapes or recordings, or any other writings or tangible things in which any forms of communication are recorded or reproduced, as well as all notations on the foregoing; and
 - b. original and all other copies not absolutely identical; and
 - c. all drafts and notes (whether typed or handwritten or otherwise) made or prepared in connection with each such document, whether used or not.

2. "MTBE" means Methyl Tertiary Butyl Ether.
3. "STUDY" or "STUDIES" includes all internal and external studies and all research, surveys, tests, investigations, assessments, drafts and summaries of same and all communications concerning each such study or studies.
4. "TBA" means Tertiary Butyl Alcohol.
5. "YOU," "YOUR," or "DEFENDANT" means responding defendant and its officers, directors, employees, partners, corporate parents, subsidiaries, affiliates, agents and representatives, and any of its affiliates, subsidiaries, predecessors, agents, or employees.

NOTICE IS FURTHER GIVEN that the deponent(s) will be deposed concerning the following issues:

DESIGNATED ISSUES

1. Whether any DOCUMENTS described in the Request to Produce Documents, which is a part of this notice, were destroyed. If so, when were said documents destroyed and by whom?
2. Authentication of all DOCUMENTS produced at the deposition.
3. What efforts were made to locate the DOCUMENTS described in the request to produce documents that accompanies this deposition notice, who performed the search, and when and what was found.
4. STUDIES done by YOU, done at YOUR direction, or that you obtained or reviewed that are designed to determine the taste and odor threshold of MTBE and/or TBA in water.
5. When, and under what circumstances, YOU first learned about MTBE's taste and odor threshold in water, and how that knowledge evolved over time.

6. When YOU first received a copy of the January 17, 2003, Product Safety Bulletin for Methyl Tertiary Butyl Ether published by Lyondell Chemical Company.
7. When YOU first received a copy of the Lyondell Material Safety Data Sheet, dated January 17, 2003.
8. When YOU first received a copy of the March 8, 1993 Campden Food and Drink Research Association STUDY titled Flavour [sic] and Odour [sic] Thresholds of Methyl Tertiary Butyl Ether (MTBE) in Water.

REQUEST FOR PRODUCTION OF DOCUMENTS

NOTICE IS FURTHER GIVEN that Defendant and its counsel are required by Federal Rules of Civil Procedure Rule 34 and Honorable Shira A. Scheindlin's Suggested Rule of Discovery Practice No. 7 to produce ten days prior to the deposition the following:

1. All DOCUMENTS reviewed, considered, and/or used by the deponent to determine the facts related to any issue set forth above and/or to prepare for this deposition.
2. All DOCUMENTS in the deponent's possession or personal file relating in any way to MTBE including any and all documents, correspondence, verbal communications, notes, e-mails, etc. regarding same, other than Attorney-Client communications.
3. The deponent's complete file relating to this lawsuit and all documents provided, reviewed, received, written or prepared relating to any aspect of this lawsuit, to include pleadings, depositions, correspondence, time records or time sheets, billing statements, handwritten notes, telephone call slips, and e-mails, other than Attorney-Client communications.
4. Deponent's current résumé, curriculum vitae and bibliography.

5. ALL DOCUMENTS relating to STUDIES done by YOU, done at YOUR direction, or that YOU obtained or reviewed that are designed to determine the taste and odor threshold of MTBE and/or TBA in water. This request includes the STUDIES themselves, any requests for proposals, protocols, drafts of the STUDIES, and any documents that discuss or analyze the STUDIES in any way.
6. Any and all copies in YOUR possession or control of the March 8, 1993 Campden Food and Drink Research Association STUDY titled Flavour and Odour Thresholds of Methyl Tertiary Butyl Ether (MTBE) in Water ("Campden Study") and copies of any DOCUMENTS which mention, concern, and/or refer to the Campden Study.
7. Any and all copies in YOUR possession or control of the January 17, 2003, Product Safety Bulletin for Methyl Tertiary Butyl Ether published by Lyondell Chemical Company ("Lyondell Safety Bulletin") and copies of any DOCUMENTS which mention, concern, and/or refer to the Lyondell Safety Bulletin.
8. Any and all copies in YOUR possession or control of the Lyondell Material Safety Data Sheet, dated January 17, 2003 ("Lyondell MSDS") and copies of any DOCUMENTS which mention, concern, and/or refer to the Lyondell MSDS.
9. DOCUMENTS which mention, concern and/or refer to when YOU first learned that MTBE can create a noticeable taste or odor when it is present in drinking and how that knowledge evolved over time.

Dated: New York, New York
October 4, 2006



William A. Walsh (WW-3301)
Robin Greenwald, Esq. (RG-9205)
Robert Gordon, Esq. (RG-3408)
WEITZ & LUXENBERG, P.C.
180 Maiden Lane, 17th Floor
New York, New York 10038-4925
Telephone: (212) 558-5500
Facsimile: (212) 558-5506

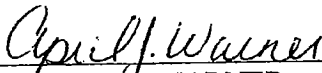
On behalf of Plaintiffs

DECLARATION OF SERVICE

I, April J. Warner, hereby declare under perjury of law that a true copy of the foregoing

PLAINTIFFS' NOTICE OF DEPOSITION UPON MOBIL CORPORATION

was served via LexisNexis File & Serve in MDL No. 1358 and upon Peter J. Sacripanti in his capacity as liaison counsel in this matter on this, the 4th day of October, 2006.



APRIL J. WARNER